

BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION  
STATE OF FLORIDA

INQUIRY CONCERNING A JUDGE,  
NUMBER 04-53, ALAN C. TODD.

CASE NUMBER SC04-1655

**THE HONORABLE ALAN C. TODD'S FIRST SET OF  
INTERROGATORIES TO  
FLORIDA JUDICIAL QUALIFICATIONS COMMISSION**

The Honorable Alan C. Todd, by and through his undersigned attorney, hereby propounds upon the Florida Judicial Qualifications Commission the following interrogatories to be answered, under oath, in accordance with Rule 1.340, Fla.R.Civ.P., and Rule 12(a), Florida Rules of Judicial Qualifications Commission.

**DEFINITIONS AND INSTRUCTIONS**

A. The term “document” or “documents” mean any and all information in tangible form and shall include, without limiting the generality of the foregoing, all letters, telegrams, telexes, teletypes, correspondence, contracts, drafts, agreements, notes to file, reports, memoranda, mechanical or electronic recordings or transcripts of such recordings, blueprints, flow sheets, calendar or diary entries, memoranda of telephone or personal conversations, memoranda of meetings or conferences, studies, reports, interoffice and intra-office communications, quotations, offers, inquiries, bulletins, circulars, statements,

manuals, summaries, newsletters, compilations, maps, charts, graphs, propositions, articles, announcements, newspaper clippings, books, records, tables, books of account, ledgers, vouchers, cancelled checks, invoices, bills, opinions, certificates, promissory notes and other evidence of indebtedness and all drafts and copies of documents as hereinabove defined by whatever means made. If multiple copies of a document exist, each copy which is in any way not completely identical to a copy which is being produced should also be produced.

B. To “identify a document” shall mean to state with respect thereto:

1. The identity of the person who prepared it;
2. The identity of the person who signed it or in whose name it was issued;
3. The identity of each person to whom it was addressed or distributed;
4. The nature or substance of the document with sufficient particularity to enable it to be identified;
5. Its date, and, if it bears no date, the date when it was prepared;
6. The physical location of the document and the custodian or custodians thereof.

7. The term “person” means any individual, corporation, partnership, joint venture, group, association, body politic, government agency, unit or other organization.

## **INTERROGATORIES**

1. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 1 (including all sub-parts) of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**

2. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 2 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**

3. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 3 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**

4. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 4 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**

5. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 5 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**



6. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 6 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. the facts as to which the witness is expected to testify.

**ANSWER:**

7. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 7 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**

8. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 8 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**

9. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 9 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**

10. Do you intend to call any witnesses at the final hearing in this matter in connection with Paragraph 10 of the Notice of Formal Charges? If so, please state as to each such witness:

- A. the witness's name, address and telephone number; and
- B. facts as to which the witness is expected to testify.

**ANSWER:**

11. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 1 (including all sub-parts) of the Notice of Formal Charges.

**ANSWER:**

12. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 2 of the Notice of Formal Charges.

**ANSWER:**

13. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 3 of the Notice of Formal Charges.

**ANSWER:**



14. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 4 of the Notice of Formal Charges.

**ANSWER:**

15. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 5 of the Notice of Formal Charges.

**ANSWER:**

16. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 6 of the Notice of Formal Charges.

**ANSWER:**

17. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 7 of the Notice of Formal Charges.

**ANSWER:**

18. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 8 of the Notice of Formal Charges.

**ANSWER:**

19. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 9 of the Notice of Formal Charges.

**ANSWER:**

20. Identify all documents upon which you intend to rely at the final hearing in this matter in connection with Paragraph 10 of the Notice of Formal Charges.

**ANSWER:**

BY: \_\_\_\_\_  
**LANSING C. SCRIVEN, Esq.**  
Special Counsel  
Florida Judicial Qualifications Commission

STATE OF FLORIDA)

COUNTY OF HILLSBOROUGH)

Before me, after being first duly sworn, personally appeared Lansing C. Scriven, and acknowledged the foregoing Answers to Interrogatories.

\_\_\_\_\_  
NOTARY PUBLIC – State of Florida

My Commission expires:

Printed or Typed Name: \_\_\_\_\_  
Personally Known: ( ) Produced I.D.: ( )  
Type of I.D. Produced: \_\_\_\_\_  
Took Oath: ( )Yes ( )No